

Before the
Federal Communications Commission
Washington, D.C. 20554

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1998 - 10-13

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)
)
Billed Party Preference for) CC Docket No. 92-77
InterLATA 0+ Calls)

COMMENTS OF SBC COMPANIES

Southwestern Bell Telephone Company, Pacific Bell and Nevada Bell (collectively referred to as the "SBC Companies") file these Comments in support of certain Petitions for Clarification/Reconsideration¹ filed in response to the Commission's Second Report and Order in the above-captioned proceeding.² Specifically, the SBC Companies support certain assertions made in the Petitions filed by Ameritech, Bell Atlantic, BellSouth Telecommunications, Inc., AT&T and US West, Inc. The Second Order should be clarified to pertain only to interstate/interLATA 0+ CALLS. The SBC Companies also agree the Commission should clarify the Second Order to require operator service providers ("OSPs") to disclose upon request only that rate information which has been provided directly to them. Finally, the obligation to disclose rate information should

¹ These Comments support positions taken by the respective parties in the Ameritech Petition for Clarification or Reconsideration ("Ameritech Petition"), the Petition for Clarification or Waiver or, in the Alternative, for Clarification and Reconsideration of US West, Inc. ("US West Petition"), the Bell Atlantic Petition for Clarification ("Bell Atlantic Petition"), the AT&T Petition for Clarification and/or Reconsideration ("AT&T Petition"), and the BellSouth Telecommunications, Inc. Petition for Clarification ("BellSouth Petition").

² In the Matter of Billed Party Preference for InterLATA 0+ Calls, CC Docket No. 92-77, Second Report and Order and Order on Reconsideration, FCC 98-9, released on January 29, 1998. ("Second Order")

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appropriately limited to the party which is responsible payment of the call's charges.

I. THE COMMISSION SHOULD CLARIFY THAT THE SECOND ORDER, CONSISTENT WITH THE UNDERLYING RECORD, PERTAINS ONLY TO 0+ INTERSTATE/INTERLATA CALLS.

In its Second Order, the Commission amended Part 64, Subpart G, Section 64.703 of Title 47 of the Code of Federal Regulations to state that rate information must be disclosed upon request to "the consumer" before connecting "any interstate, interexchange 0+ call." Subsequently, on February 12, 1998, the Commission issued an Erratum changing "0+" to "non-access code operator service." As the referenced Petitioners correctly argue³, the record in this proceeding supports only directives regarding interLATA 0+ calls, not "interstate, interexchange" calls. Moreover, apparently only the Commission can decipher the meaning of its Erratum substitution. While the purpose of an Erratum is generally to correct a typographical error or an obvious omission, this modification might be read as substantially altering the scope of this docket .

The focus of this matter since its inception has been interLATA 0+ calls. Predecessor proceedings, as well as the passage of the Telephone Operator Consumer Services Improvement Act ("TOCSIA"), sought to stem abuses in the interLATA arena in relation to unreasonably high rates and anticompetitive practices. This proceeding simply is a natural extension of these attempts to protect the consumer. At no time in its successive Notices of Proposed Rulemaking , did the Commission expressly propose to expand the scope of this proceeding to intraLATA calls. If it was the intent of

³ Ameritech Petition, pp. 13-20; Bell Atlantic Petition, pp. 1-2; U S West Petition, pp. 5-9; BellSouth Petition, p. 3.

the Commission to apply its proposed regulations to interstate/intraLATA calls, the parties were not adequately apprised of this intent, as evidenced by the Comments and Reply Comments filed. Rather, the parties assumed that, consistent with the caption of the proceeding, only interLATA calls were the subject of the Commission's analysis.

As discussed in greater detail by certain of the Petitioners,⁴ an alternate reading of the Second Order as applying to interstate/intraLATA calls would impose a significant expense upon local exchange carriers ("LECs") with no opportunity for cost recovery. As with US West, BellSouth and Ameritech, within the SBC Companies there are only very limited instances in which they provide interstate/ intraLATA operator services. However, because the SBC Companies are not capable of applying a unique treatment to 0+ calls originating from these limited aggregator locations, they would effectively be required under this interpretation to implement rate disclosure procedures for all 0+ calls, regardless of jurisdiction. Thus, the Second Order would far exceed its reasonable parameters by imposing an expensive burden upon LECs without due process.

Similarly, the SBC Companies support the position of Bell Atlantic and BellSouth⁵ that only 0+ calls are encompassed by the Commission's dictates. The substitution of the Erratum language confuses, rather than clarifies, this point. While the Second Order itself is clear that its requirements pertain to 0+ calls, the new provision which deletes the reference to "0+" clouds what was previously clear.

⁴ BellSouth Petition, p.3; Ameritech Petition, p. 17; U S West Petition, pp. 7-9

⁵ BellAtlantic Petition, pp. 2-3; BellSouth Petition, p 2.

For these reasons, the SBC Companies join the referenced Petitioners in urging the Commission to clarify its Second Order, and its resulting modifications to Section 64.703, to pertain only to 0+ interstate/interLATA calls.

II. THE COMMISSION SHOULD CLARIFY THAT THE RATE DISCLOSURE REQUIREMENTS APPLY ONLY TO CHARGES WHICH ARE BILLED BY THE OPERATOR SERVICES PROVIDER AND/OR RATE INFORMATION AVAILABLE TO THE OPERATOR SERVICES PROVIDER.

As certain of the Petitioners⁶ note, a literal reading of the rate disclosure requirements would require an OSP to disclose rate information as to all separate property fees imposed by call aggregators. This requirement is infeasible. Unless an OSP is billing these charges on behalf of the aggregator, it has no way of knowing what separate fees are being imposed. Moreover, it is logistically impossible to expect the OSP to gain this information through any other means. There are no restrictions on the frequency with which hotels and other aggregators may change these rates. To track and update rates provided voluntarily by aggregators is clearly untenable.

Moreover, the Commission should now recognize that the LECs often are providing wholesale operator services to other competing local service providers.⁷ In this role, the LEC must have access to the various rates charged by competing providers in

⁶ Bell Atlantic Petition, p. 3; U S West Petition, pp. 10-12; Ameritech Petition, pp. 20-23, AT&T Petition, p. 3.

⁷ All LECs have the obligation to provide non-discriminatory access to operator services under Sec. 251(b)(3). [47 U.S.C. 251]. SBC Companies may be providing operator services on behalf of competing local exchange providers under interconnection agreements or resale arrangements. In these situations, the competing providers are responsible for setting rates and billing their end-users. Unless the SBC Companies' operator has access to information on the rates charged by competing providers, the operator will not be able to disclose these rates to a caller.

order to disclose rate information to the end-user. The Commission should clarify that all such carriers have an obligation to provide rate information to their OSPs to enable the OSPs to meet the disclosure obligations imposed by this order. If an OSP is denied information as to the rates charged by other carriers, it cannot be held liable for noncompliance.

For these reasons, the SBC Companies strongly endorse the positions of other Petitioners that the Commission should not require OSPs to provide rate information to which they lack access.

III. THE COMMISSION SHOULD SPECIFY THAT THE PARTY RESPONSIBLE FOR THE PAYMENT OF 0+ CHARGES SHOULD BE THE RECIPIENT OF RATE DISCLOSURE INFORMATION.

As modified, Section 64.703 would require that rate disclosure information be made available to the "consumer". The SBC Companies agree with AT&T⁸ that, in the case of 0+ collect calls and calls billed to a third number, it is unclear whether the calling party or the called party should be entitled to rate disclosure information. Since the primary purpose of the disclosure is to notify the party responsible for payment as to the amount of the rate, so that he can make a considered decision as to whether to incur the charge, it is reasonable to provide this information to the billed party. For this reason, the SBC Companies support AT&T's position in relation to 0+ collect calls and calls billed to a third number.

IV. CONCLUSION

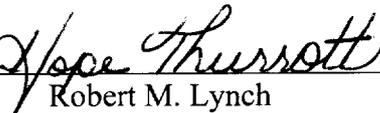
The SBC Companies believe that the issues raised by the referenced Petitioners

⁸ AT&T Petition, pp. 2-3.

illustrate the confusion which exists in the industry as to the interpretation and application of the Second Order. The clarification sought by these parties is well-founded both in law and in fact. On this basis, the SBC Companies support these Petitioners by seeking the Commission's clarification that: (1) the Second Order pertains only to interstate/interLATA 0+ calls; (2) an OSP only is required to disclose those rates of which it has knowledge and ; (3) an OSP only is required to provide rate disclosure information to the billed party.

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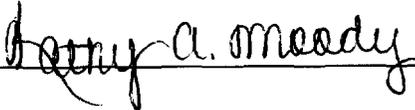
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I, Kathy A. Moody, hereby certify that "Comments of SBC Companies" in CC Docket No. 92-77 have been served on May 6, 1998, to the Parties of Record.


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